## EDWARDS HENDERSON THE CRIME VICTIM LAW FIRM

Florida Office

425 North Andrews Avenue Suite 2 Fort Lauderdale, FL 33301 Telephone (954)524-2820 Fax (954)524-2822 info@cvlf.com New York Office

By Appointment only

August 5, 2025

## **BY ECF:**

Hon. Gregory H. Woods United States District Court Southern District of New York Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, NY 10007-1312

RE: *Jane Doe v. OneTaste*, Case No. 1:23-cv-10184 GHW(S.D.N.Y.) – Letter to Court regarding Update pursuant to June 5, 2024 Order

Dear Judge Woods:

Pursuant to the Court's Order dated June 4, 2025, directing the parties to provide an update regarding the status of the related criminal proceedings upon no later than the earlier of (a) the final adjudication of the criminal action, or (b) August 5, 2025 [D.E. 35], the parties submit the following:

As of the date of this Letter Motion, Nicole Daedone and Rachel Cherwitz have been convicted of conspiracy to commit forced labor. Sentencing for Ms. Cherwitz is scheduled for September 25, 2025, and sentencing for Ms. Daedone is scheduled for September 26, 2025.

On July 8, 2025 Ms. Daedone and Ms. Cherwitz filed a motion for acquittal pursuant to Federal Rule of Criminal Procedure 29(c). In that motion they argued, <u>inter alia</u>, that the government impermissibly used Defendants' First Amendment protected spiritual beliefs, practices and spiritual community to meet its burden of proof. The government filed its opposition brief on July 22, 2025. If the Court grants the motion, it may set aside the verdict and enter an acquittal.

If the motion to acquit is not granted, the parties request that the stay be lifted on September 27, 2025, as the sentencings would constitute a final adjudication of the criminal matter. Should sentencing be delayed for any reason, the parties agree that the stay should be lifted the following

Hon. Gregory H. Woods

Jane Doe v. OneTaste, Case No. 1:23-cv-10184 GHW(S.D.N.Y.)

Page 2

day after both Ms. Daedone and Ms. Cherwitz are sentenced. In this eventuality the parties will file a letter updating the court as to new sentencing date.

Respectfully submitted, Edwards Henderson

Bradley Edwards

Brittany Henderson

Brad@cvlf.com

Brittany@cvlf.com